

**Environmental Assessment
Determinations and Compliance Findings
for HUD-assisted Projects
24 CFR Part 58**

Project Information

Project Name: Alborada-Apartments

HEROS Number: 900000010052677

Responsible Entity (RE): TUCSON, PO Box 27210 Tucson AZ, 85726

RE Preparer: Glenn Fournie

State / Local Identifier:

Certifying Officer: Liz Morales

Grant Recipient (if different than Responsible Entity):

Point of Contact:

Consultant (if applicable):

Point of Contact:

Project Location: 250 E Grant Rd, Tucson, AZ 85705

Additional Location Information:

2620 N. Balboa Avenue, Tucson Pima County AZ 85705; 2940 N. Oracle Road, Tucson Pima County AZ 85705; 250 W. Grant Road, Tucson Pima County AZ 85705; Sunnyside Pointe (845 E. Equality Lane Tucson Pima County AZ 85706 used for mapping purposes).

Direct Comments to: Glenn Fournie, Glenn.Fournie@tucsonaz.gov
City of Tucson Housing and Community Development
Department
310 N. Commerce Park Loop Tucson AZ 85745 .

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:

The Alborada Apartments project includes demolition of 3 vacant and abandoned structures, excavation, trenching, and grading for the new construction of 127 affordable housing units to be constructed on four scattered sites in the City of Tucson, Pima County Arizona: 250 E. Grant Road, Tucson Pima County AZ 85705 - new construction of 63 units on vacant improved land; 2620 N. Balboa Street, Tucson Pima County AZ 85705 - demolition of 3 existing structures and new construction of 30 one-bedroom units; 2940 N. Oracle Road, Tucson Pima County AZ 85705 - new construction of 14 one-bedroom units on vacant improved land; Sunnyside Point- new construction of 20 3-bedroom free standing units on vacant improved lots in an existing subdivision. The project will include the availability of existing community space for the Oracle and Sunnyside Point sites. The project will also be a smoke-free facility. Onsite parking spaces and bicycle parking will be available at all project sites. The project will also comply with fair housing and accessibility requirements. Conditional award of 31 Project Based Vouchers from the City of Tucson Housing and Community Development Department.

Statement of Purpose and Need for the Proposal [40 CFR 1508.9(b)]:

The City's central long-term community development goal is to focus resources on community needs, particularly the comprehensive revitalization of distressed areas and areas with high levels of poverty. This project supports the City of Tucson Consolidated Plan policies to develop supportive housing including: 1) New construction and/or rehabilitation of rental units for target populations; 2) Complexes serving special target populations; 3) The preservation of existing lower income housing and/or increasing the supply of lower income housing; and 4) Self-sufficiency in lower income households. This project also supports the strategy for helping people make the transition to permanent housing and independent living; and increasing the capacity of non-profit organizations. The units will target households earning between 40% to 60% of the Area Median Income and the three bedroom units will be reserved for households with children. The Grant, Balboa and Oracle sites are located in the City of Tucson Choice Neighborhood Grant area and the Oracle Revitalization Area.

Existing Conditions and Trends [24 CFR 58.40(a)]:

The 2620 N. Balboa includes three deteriorated and fire damaged buildings of concrete slab-on-grade and masonry construction: two single-family residences and a duplex. A chain-linked fence surrounds the Property and separates each yard. The site has been vandalized with evidence of use by homeless individuals. The site is in the rapidly growing Stone/Oracle core gateway area and the Oracle Revitalization Area. The 2940 N. Oracle property is currently vacant land that has been previously developed, with the new Miracle Point Apartment complex sharing the same construction site and the same Developer. The site is in the rapidly growing Stone/Oracle core gateway area and the

Oracle Revitalization Area. The 250 W. Grant property is currently vacant land that has been previously developed, with new infrastructure improvements from the recent Grant Road widening project and the new E. Grant Road/S. 6th Avenue intersection improvements, in an area of increasing development of both housing and businesses. Sunnyside Pointe property is in an existing urban development, on the last 20 building sites in the development. The sites are fully ready for construction, with utilities, roads and other improvements in place.

Maps, photographs, and other documentation of project location and description:

[2620 N Balboa Ave - Google Maps.pdf](#)

[2490 N Oracle Rd - Google Maps.pdf](#)

[845 E Equality Ln - Google Maps.pdf](#)

[250 W Grant Rd - Google Maps.pdf](#)

[Alborado Sunnyside Pointe Site Visit 8-1-19.pdf](#)

[2940 N Oracle site visit 2-17-19.pdf](#)

[2620 N Balboa site visit 2-7-19.pdf](#)

[250 E Grant site visit 2-8-19.pdf](#)

Determination:

✓	Finding of No Significant Impact [24 CFR 58.40(g)(1); 40 CFR 1508.13] The project will not result in a significant impact on the quality of human environment
	Finding of Significant Impact

Approval Documents:

7015.15 certified by Certifying Officer on:

7015.16 certified by Authorizing Officer on:

Funding Information

Grant / Project Identification Number	HUD Program	Program Name
M-17-DC-04-0229	Community Planning and Development (CPD)	HOME Program

Estimated Total HUD Funded, Assisted or Insured Amount: \$1,500,000.00

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: \$25,698,040.00

Compliance with 24 CFR §50.4, §58.5 and §58.6 Laws and Authorities

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4, §58.5, and §58.6	Are formal compliance steps or mitigation required?	Compliance determination (See Appendix A for source determinations)
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.6		
Airport Hazards Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project sites are not within 15,000 feet of a military airport or 2,500 feet of a civilian airport, or in. Runway Projection Zone/Clear Zone (RPZ/CZ) or Accident Potential Zone (APZ). The project is in compliance with Airport Hazards requirements.
Coastal Barrier Resources Act Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project is located in a state that does not contain CBRS units. Therefore, this project is in compliance with the Coastal Barrier Resources Act.
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project sites are not in FEMA-designated Special Flood Hazard Areas. 250 W. Grant Road, Tucson Pima County AZ 85705 - Zone X 4019C-2277 L dated 6/16/2011. 2620 N. Balboa Avenue, Tucson Pima County AZ, 85705 - Zone X 4019C-1688 L dated 6/16/2011. 2940 N. Oracle Road, Tucson Pima County AZ, 85705 - Zone X 4019C-2276 L dated 6/16/2011. Sunnyside Pointe, Tucson Pima County AZ 8506 - Zone X 4019C-2287 L dated 6/16/2011. The City of Tucson, #040076 is a participating member of the NFIP as of 8/5/19 per the FEMA Community Status Book Report. The project is in compliance with flood insurance requirements.
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.5		
Air Quality Clean Air Act, as amended,	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project's county or air quality management district is in non-

<p>particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93</p>		<p>attainment status for Carbon monoxide. This project does not exceed de minimis emissions levels or the screening level established by the state or air quality management district for the pollutant. ADEQ and Pima County Department of Environmental Quality sites have been reviewed and these agencies have no concerns about multi-family or small apartment complexes (under 100 units) development in existing residential areas changing or adversely impacting air quality control standards. This project has no more than 63 units on any single site. ADEQ has no active impact sites in Tucson. The project is in compliance with the Clean Air Act.</p>
<p>Coastal Zone Management Act Coastal Zone Management Act, sections 307(c) & (d)</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>This project is located in a state that does not participate in the Coastal Zone Management Program. Therefore, this project is in compliance with the Coastal Zone Management Act.</p>
<p>Contamination and Toxic Substances 24 CFR 50.3(i) & 58.5(i)(2)]</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>Site contamination was evaluated as follows: ASTM Phase I ESA, ASTM Phase II ESA. On-site or nearby toxic, hazardous, or radioactive substances that could affect the health and safety of project occupants or conflict with the intended use of the property were not found. The Phase I ESAs on 3 of the properties by Western Technologiew Inc. dated August 2019 revealed no evidence of RECs currently in connection with the Property. On the Grant Road site it was determined that the Property historically had an underground storage tank (UST) system and this historic UST system creates a Potential Recognized Environmental Condition. The Phase II ESA laboratory results indicated no VOCs or PAHs were detected above the laboratory reporting limits. The laboratory reported concentrations of the eight RCRA metals were considered normal background concentrations. Lead and asbestos</p>

		testing and remediation are required as part of the demolition permit for the Balboa site. Lead and asbestos tests are required, along with a remediation plan before the issuance of the demolition permit and work will be performed using environmentally safe practices. The project is in compliance with contamination and toxic substances requirements.
Endangered Species Act Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project will have no effect on any federally protected (listed or proposed) Threatened or Endangered Species, nor adversely modify designated critical habitats. The sites are fully or previously developed urban infill parcels in urban neighborhoods. The sites do not have water features or vegetation, and no visible sign of animal habitation. The U.S. Fish and Wildlife Services show no critical habitat areas in the Tucson Metropolitan area. The project is compliance with the Endangered Species Act. This project is in compliance with the Endangered Species Act.
Explosive and Flammable Hazards Above-Ground Tanks)[24 CFR Part 51 Subpart C	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	After review of the Phase I Environmental Site Assessments by Western Technologies, Inc., dated August 2019 and site visits by City of Tucson Housing and Community Development staff 2/7/19, and review of known environmental registrations and maps, the determination is that the project sites are not in the vicinity of any hazardous operation involving explosive or flammable fuels or chemicals. There are no current or planned stationary above ground storage containers of concern within 1 mile of the project sites. The project sites are in fully developed urban residential/mixed use neighborhoods. The project is in compliance with explosive and flammable hazard requirements.

<p>Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>The sites do not meet the definition of farmland per 7 CFR Part 658.2 a (1) "Farmland" does not include land already in or committed to urban development or water storage. The sites are in a fully developed urban environment per USDA Soils Survey Map printed 5/11/18. This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The project is in compliance with the Farmland Protection Policy Act.</p>
<p>Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>The project sites are not in FEMA-designated Special Flood Hazard Areas. 250 W. Grant Road, Tucson Pima County AZ 85705 - Zone X 4019C-2277 L dated 6/16/2011. 2620 N. Balboa Avenue, Tucson Pima County AZ, 85705 - Zone X 4019C-1688 L dated 6/16/2011. 2940 N. Oracle Road, Tucson Pima County AZ, 85705 - Zone X 4019C-2276 L dated 6/16/2011. Sunnyside Pointe, Tucson Pima County AZ 8506 - Zone X 4019C-2287 L dated 6/16/2011. The project is in compliance with Executive Order 11988.</p>
<p>Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>Based on the project description the project has No Potential to Cause Effects. The Area of Potential Effects (APE) for the Alborada Apartments project is defined as the individual area of construction on of each of the 4 sites. No effects are anticipated outside the immediate area of construction on each site. A memo with the determination that there are no historic properties affected per 36 CFR 800.4 from City of Tucson Historic Preservation Officer is dated 1/31/19, and in accordance with the programmatic agreement with the City of Tucson, SHPO and ACHP dated 1/25/2002. The project is in compliance with Section 106.</p>
<p>Noise Abatement and Control Noise Control Act of 1972, as</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>A Noise Assessment was conducted for all four sites. The noise level at 3 of the</p>

amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B		4 sites was in the acceptable range, with standard construction practices bringing the interior noise level to or below the 45 dB minimum requirement. One site, 250 E. Grant Road was at 66.5 DNL, in the normally unacceptable range. With the sound attenuation measures listed in the mitigation section and confirmed by the project architect, the interior noise level will meet or exceed the 45 dB interior noise requirements. The project is in compliance with HUD's Noise regulation with mitigation.
Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project is located on a sole source aquifer. The region has an MOU or other working agreement with EPA for HUD projects impacting a sole source aquifer, and the MOU or working agreement excludes the project from further review. The project will utilize existing municipal water and sewer systems. The project is in compliance with Sole Source Aquifer requirements.
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project does not involve new construction within or adjacent to wet lands, marshes, wet meadows, mud flats or natural ponds. The wetland area near Sunnyside Pointe is limited to a drainage channel not impacted by the project. The project is in compliance with Executive order 11990.
Wild and Scenic Rivers Act Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project is not within proximity of a NWSRS river. Tucson and Southern Arizona have no wild and scenic rivers. The project is in compliance with the Wild and Scenic Rivers Act.
HUD HOUSING ENVIRONMENTAL STANDARDS		
ENVIRONMENTAL JUSTICE		
Environmental Justice Executive Order 12898	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The proposed sites are suitable for the proposed use and will NOT be adversely impacted by adverse environmental conditions. This environmental review demonstrates that there are no issues of non-compliance with the related laws and authorities and there are no known

		unresolved impacts. The project is in compliance with Executive Order 12898.
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Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 &1508.27]

Impact Codes: An impact code from the following list has been used to make the determination of impact for each factor.

- (1) Minor beneficial impact
- (2) No impact anticipated
- (3) Minor Adverse Impact – May require mitigation
- (4) Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement.

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	The 4 sites are consistent with local and regional planning efforts, and has received planning and zoning approval from the City of Tucson. The project sites are zoned R-2, R-3 and C-2. The project supports the goals of Plan Tucson, the 2013 City of Tucson General & Sustainability Plan to provide housing, human services, public facilities, and economic development programs to address the housing needs of the most vulnerable populations. https://www.tucsonaz.gov/pdsd/plan . The project also supports the goals of the Tucson-Pima HUD 5 Year Consolidated Plan. The project converts currently vacant and/or underutilized sites to attractive modern housing units that conform within the surrounding neighborhoods in terms of overall scale, density, size, and massing. The project will meet the City's Housing Quality Standards (HQS) and is being designed in accordance to the Arizona Department of Housing's Mandatory Design Guidelines (Exhibit D of the 2019 Qualified Allocation Plan under the Low Income Housing Tax Credit program). Letter dated 3/23/19 of site plan and zoning approval by Scott Clark, interim Director PDSD.	
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	2	No evidence of erosion, drainage/storm water runoff on site visit by HCD staff 2/19 and updated 8/19. All sites reviewed and approved for construction by Steve Shields City of Tucson PDSD with no further zoning or permit approvals required before construction. Geotechnical Reports by Patterson Engineering and Ground Support Engineering found the soil	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		composition suitable for the construction of the project. Phase I ESAs by Western Technologies Inc.dated August 2019.	
Hazards and Nuisances including Site Safety and Site-Generated Noise	2	No evidence at any of the 4 scattered sites of onsite hazards or nuisances including soil contamination; proximity to high pressure pipe lines or other volatile and explosive products; high-voltage transmission lines; radio/TV transmission towers; excessive smoke, fumes, odors subsidence, ground water, inadequate surface drainage, flood, etc. Tucson Electric Power owned transformers on or near the sites were all in good condition with no evidence of spills or leakage. Three sites have been cleared and graded, ready for construction and have no vegetation or natural features.Evidence of extensive vandalism, fire and temporary habitation by homeless persons at the 4th site 2620 N. Balboa.There are no visible poisonous plants or animals on the sites. No known natural hazards exist. The sites have access to intersections with traffic lights and cross walks for residents to cross the street, street lighting, sidewalks, bike lanes and other safety features. Other than a brief period of construction there should be no increase in noise levels. Phase I environmental site assessments by Western Technologies, Inc. dated August 2019 and site visit by HCD staff 2/7/19 and updated 8/6/19.	
Energy Consumption/ Energy Efficiency	2	Minor increase in energy consumption by 127 new units of housing. Buildings will be constructed to Arizona Department of Housing (ADOH) prescriptive path to sustainability, which is roughly equivalent to a LEED Gold standard, with highly-reflective roofs, Energy Star high efficiency appliances and low water usage fixtures. In addition, the air ducts & registers will be sealed and low flow plumbing installed.	
SOCIOECONOMIC			
Employment and Income Patterns	2	The Developer anticipates hiring approximately 20 subcontractors and creating possibly 50 temporary construction jobs during the construction phase of the project. The project will follow Section 3 and Davis Bacon requirements in all employment, construction and subcontracting activities. 30% of all new hires shall be Section 3 residents and 10% of all subcontractors shall be Section 3 certified businesses. The sites are within walking distance or a short commute on public transit to numerous retail,	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		restaurant and service businesses with entry level and service job possibilities. Job training and job search assistance with placement services will be offered on site by La Frontera.	
Demographic Character Changes / Displacement	2	The 4 project sites are in areas of low and moderate income, mixed use areas with over 55% minority populations, and with the majority of housing units currently being used as rentals. The small number of units at each site will limit any possible demographic impacts. The sites are all vacant land or uninhabited abandoned structures, so there will be no displacement.	
COMMUNITY FACILITIES AND SERVICES			
Educational and Cultural Facilities (Access and Capacity)	2	The target population for the project is low income individuals and families. Most of the clients will be single individuals without children, so the impact on educational facilities will be minimal. The sites are within 2 miles of Tucson Unified School District K-12 schools, magnet high schools, and private charter schools and preschools. TUSD has an open enrollment policy, so any school in the district with spaces available is open for enrollment. http://www.tusd1.org/Information/Enrollment/OpenEnrollment/tabid/80260/Default.aspx . Also within 5 miles are a number of colleges and adult education resources including Pima Community College, University of Arizona and other education programs. Educational and cultural enrichment opportunities are available at nearby community centers, libraries, recreation centers, theaters, museums, parks and a number of veteran organizations.	
Commercial Facilities (Access and Proximity)	2	The project sites are within 1 mile of major grocery stores, pharmacies, retail and service businesses, discount stores, medical providers, thrift stores, and within 5 miles of 2 major regional retail malls. The project sites are directly on major bus routes connecting to transit hubs.	
Health Care / Social Services (Access and Capacity)	2	The project sites are all within 2 miles of major medical centers and emergency rooms, and within 5 miles of the Southern Arizona VA Health Care campus. Numerous emergency facilities, clinics, and physician services are within an easy commute on public transit. Support services nearby include CODAC Behavioral Health, COPE Community Services, VA Tucson Veterans Center and La Frontera facilities. Support services and referrals will also be provided by the onsite	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		Resident Services Coordinator provided by La Frontera. The additional residents will not have an adverse impact on the available services, since most of the prospective clients are already in the community and receiving services and the units are distributed at 4 scattered sites in the community.	
Solid Waste Disposal and Recycling (Feasibility and Capacity)	2	The City of Tucson Environmental Services Department will provide onsite waste disposal and recycling services. The City of Tucson provides extensive recycling options, including construction debris handling and recycling, landfills, green waste recycling and household hazardous waste disposal services. Will Serve letter from Carlos De La Torre, Director, City of Tucson Environmental Services Department dated 3/7/19.	
Waste Water and Sanitary Sewers (Feasibility and Capacity)	2	Pima County Wastewater will provide wastewater and sewer service to project. Will Serve letter from Kurt Stemm, Pima County Wastewater Management dated 2/4/19.	
Water Supply (Feasibility and Capacity)	2	Tucson Water will provide water service to project. Will Serve letter from Michael Mourreale, Tucson Water dated 2/13/19.	
Public Safety - Police, Fire and Emergency Medical	2	Letter from interim Fire Chief Joe Gulotta at Tucson Fire Department dated 3/11/19 states that Tucson Fire Department will provide protection services in the form of fire and emergency medical response for the project. Average response time for TFD is 4 minutes. Chief of Police Chris Magnus at Tucson Police Department (TPD) stated in a letter dated 3/8/19 that TPD will provide protection services in the form of emergency response for the project. Response time varies depending on the type of call, but the average time for emergency response is 5 minutes or less. The project sites are within 2 miles of major medical centers with emergency medical care including Banner UMC Medical Center, TMC Medical Center, Carondolet St. Mary's Medical Center and numerous hospitals and urgent care facilities.	
Parks, Open Space and Recreation (Access and Capacity)	2	2940 N. Oracle Road, Tucson AZ 85705. The site is within 2 blocks of Laguna Park, and within 2 miles of major recreation centers with sports fields, playgrounds, basketball courts, swimming pools and rec centers. The site is within 3 miles of the Armory Park Senior Center. 2620 N. Balboa Avenue,	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		Tucson AZ, 85705 The site is within 2 blocks of the Martin Birdman Center, and within 2 miles of major recreation centers with sports fields, playgrounds, basketball courts, swimming pools and rec centers. The site is within 3 miles of the Armory Park Senior Center. 250 N. Grant Road, Tucson AZ, 85705. The site is across the street from Mansfield Park and the Donna Liggins Recreation Center-a major recreation center with sports fields, playgrounds, basketball courts, swimming pool, within 2 blocks of the Balboa Heights Park,	
Transportation and Accessibility (Access and Capacity)	2	Suntran bus stops are in close proximity to the project sites with Routes 9, 10, 16, 19 or 25 providing residents access to major transit hubs and the Greyhound Bus Line. The sites are fully accessible by car and have adequate street access. Ample on street parking exists in the immediate area and off street parking spaces are included in the project plans. Long term bicycle parking is planned at all 4 sites. The residents have access to the City of Tucson Sun Shuttle and other medical transportation providers. Letter from Samuel Credio, Deputy Director TDOT dated 3/7/19.	
NATURAL FEATURES			
Unique Natural Features /Water Resources	2	The sites have no unique natural features or water. The sites are in fully developed urban neighborhoods, and surrounded by urban residential housing and small commercial businesses. All of the sites have been cleared and graded or previously developed. Phase I environmental site assessments by Western Technologies Inc. dated August 2019 and site visits by HCD staff 2/7/19, updated 8/6/19.	
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)			
Other Factors			

Supporting documentation[SSP Geotech 9.20.15.pdf](#)[Alborada Oracle Geotech 8.21.19.pdf](#)[Alborada Apartements Grant Geotech 8.19.19.pdf](#)

[Aborada-Balboa Geotech 8.19.19.pdf](#)
[Sunnyside Aerial 2-12-19\(2\).pdf](#)
[2940 N Oracle Aerial 2-12-19\(2\).pdf](#)
[2620 N Balboa Ave aerial 2-12-19\(2\).pdf](#)
[250 W Grant aerial 2-12-19\(2\).pdf](#)
[CensDemoMapPrn Sunnyside 8-6-19.pdf](#)
[CensDemoMapPrn Oracle 8-6-19.pdf](#)
[CensDemoMapPrn Balboa 8-6-19.pdf](#)
[CensDemoMapPrn 250 W Grant 8-6-19.pdf](#)
[Alborado support letters 8-6-19.pdf](#)
[Form 8 Zoning Alborada Apartments.pdf](#)
[Alborada Apartments HOME application.pdf](#)

Additional Studies Performed:

Field Inspection [Optional]: Date and completed

by:

Glenn Fournie

2/7/2019 12:00:00 AM

[Alborado Sunnyside Pointe Site Visist 8-1-19.pdf](#)
[2940 N Oracle site visit 2-17-19.pdf](#)
[2620 N Balboa site visit 2-7-19.pdf](#)
[250 E Grant site visit 2-8-19.pdf](#)

List of Sources, Agencies and Persons Consulted [40 CFR 1508.9(b)]:

Arizona Department of Housing (ADOH)-Jeanne Redondo, Lori Hoffner HUD-Stanley Toal
City of Tucson Office of the Mayor-Mayor Jonathan Rothschild City of Tucson Housing
and Community Development Department-Liz Morales, Sally Stang, Joyce Alcantar City
of Tucson Planning and Development Services-Scott Clark, Interrim Director, Steve
Shields City of Tucson Department of Transportation-Samuel Credo, Deputy Director
City of Tucson Office of Integrated Planning-Rebecca Roupp Tucson Fire Department-
Joseph Gulotta, Interim Fire Chief Tucson Police Department- Chief Chris Magnus City of
Tucson Department of Environmental Quality -Carlos De La Torre, Director Tucson
Water- Michael Mourreal, PE Pima County Wastewater Management- Kurt Stemm, CEA
SR City of Tucson Historic Preservation Office - Allison Deihl City of Tucson and Pima
County Consortium HUD Consolidated Plan:
https://www.tucsonaz.gov/files/hcd/City_of_Tucson_and_Pima_County_FFY2015-2019_5-year_HUDConsolidated_Plan.pdf City of Tucson General & Sustainability Plan
<https://www.tucsonaz.gov/pdsd/plan-tucson>

List of Permits Obtained:

The reviews that go into each project include but are not limited to: Planning, Zoning, Engineering, Landscape, Fire, ADA, Plumbing, Solid Waste, Right of Way Improvements, Structural, Mechanical and Plumbing, Electrical, Fire, Zoning Engineering, Wastewater, Water, Transportation. The City of Tucson Planning and Development Services Department reviews, approves and issues all permits for: zoning, site plans, grading, storm water, demolition, parking, landscape and construction trades; issues all permits; performs inspections and issues certificate of occupancy. The Department enforces building and zoning codes.

Public Outreach [24 CFR 58.43]:

Publication of the FONSI/RROF September 4, 2019 in the Arizona Daily Star, and interested parties contacted by email. The Environmental Review Record (ERR) that documents the environmental determinations for this project is available at <http://www.tucsonaz.gov/hcd/whats-new> and on file at City of Tucson Housing and Community Development Department, 310 S. Commerce Park Loop, Tucson, Pima County Arizona 85745 and may be examined weekdays 8:00 a.m. to 5:00 p.m. The ERR will also be available and distributed on the HUD HEROS system.

Cumulative Impact Analysis [24 CFR 58.32]:

The proposed new construction and major rehabilitation project is located at 4 separate project sites, 3 are near the rapidly growing Tucson downtown gateway area and the Oracle Area Improvement Project. The project will be a minor contributor to the projected increase in population, traffic and energy usage already anticipated for the area. The project sites are infill development in existing urban neighborhoods that will use existing roadways, sewer systems, municipal water and other utilities already in place. No significant cumulative impacts on the environment would be anticipated from the Proposed Action in conjunction with other activities.

Alternatives [24 CFR 58.40(e); 40 CFR 1508.9]

No alternatives other than the no action alternative were considered.

No Action Alternative [24 CFR 58.40(e)]

127 units of desperately needed new affordable housing units would not be built. Goals of the City of Tucson Consolidated Plan would not be fulfilled. La Frontera will miss the ADOH Low Income Housing Tax Credit funding opportunity that makes the project affordable at this time. Thirty one (31) Project-Based Vouchers from the City of Tucson Housing and Community Development Department Public Housing Authority would not be utilized. The sites will remain vacant, neglected and under-developed.

Summary of Findings and Conclusions:

The proposed new construction of 127 units of low income housing units on 4 scattered sites will not adversely affect environment or the neighborhoods. The activity is compatible with the existing mixed uses in the areas. There will be little to no impact on existing resources or services in the area. The land is available and the site plans are approved. The Thirty one (31) Section 8 Project-Based Vouchers have been set aside. The project is a positive step in meeting City of Tucson goals for encouraging appropriate growth and development in the area.

Mitigation Measures and Conditions [CFR 1505.2(c)]:

Summarized below are all mitigation measures adopted by the Responsible Entity to reduce, avoid or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Law, Authority, or Factor	Mitigation Measure or Condition	Comments on Completed Measures	Complete
Noise Abatement and Control	Noise wall at 250 E. Grant Road running east to west along Grant Road. 1. 2X6 exterior walls with R-21 Batt insulations in cavities and 1 1/2" foam insulation with Stucco Finish on exterior walls combined these are R-27 rated. - 2. Maximum 48"X72" vinyl in living room and 48"X48" vinyl - sliding dual pane windows for bedrooms, Low-E glass, fully sealed and weatherized. - 3. Solid cord wood access/egress doors with rubberized threshold and full weather stripping. Doors are 36" X 80". - 4. All units are central heating and cooled.	N/A	
Permits, reviews and approvals	The reviews that go into each project include but are not limited to: Planning, Zoning, Engineering, Landscape, Fire, ADA, Plumbing, Solid Waste, Right of Way Improvements, Structural, Mechanical and Plumbing, Electrical, Fire, Zoning Engineering, Wastewater, Water, Transportation. The City of Tucson Planning and Development Services	N/A	

	Department reviews, approves and issues all permits for: zoning, site plans, grading, storm water, demolition, parking, landscape and construction trades; issues all permits; performs inspections and issues certificate of occupancy. The Department enforces building and zoning codes.		
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Mitigation Plan

The City of Tucson Planning and Development Services Department reviews, approves and issues all permits for: zoning, site plans, grading, storm water, demolition, parking, landscape and construction trades; issues all permits; performs inspections and issues certificate of occupancy. The Department enforces building and zoning codes.

Supporting documentation on completed measures

APPENDIX A: Related Federal Laws and Authorities

Airport Hazards

General policy	Legislation	Regulation
It is HUD's policy to apply standards to prevent incompatible development around civil airports and military airfields.		24 CFR Part 51 Subpart D

1. To ensure compatible land use development, you must determine your site's proximity to civil and military airports. Is your project within 15,000 feet of a military airport or 2,500 feet of a civilian airport?

No

Based on the response, the review is in compliance with this section. Document and upload the map showing that the site is not within the applicable distances to a military or civilian airport below

Yes

Screen Summary

Compliance Determination

The project sites are not within 15,000 feet of a military airport or 2,500 feet of a civilian airport, or in Runway Projection Zone/Clear Zone (RPZ/CZ) or Accident Potential Zone (APZ). The project is in compliance with Airport Hazards requirements.

Supporting documentation

[Airport map 2-12-19.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Coastal Barrier Resources

General requirements	Legislation	Regulation
HUD financial assistance may not be used for most activities in units of the Coastal Barrier Resources System (CBRS). See 16 USC 3504 for limitations on federal expenditures affecting the CBRS.	Coastal Barrier Resources Act (CBRA) of 1982, as amended by the Coastal Barrier Improvement Act of 1990 (16 USC 3501)	

This project is located in a state that does not contain CBRA units. Therefore, this project is in compliance with the Coastal Barrier Resources Act.

Compliance Determination

This project is located in a state that does not contain CBRS units. Therefore, this project is in compliance with the Coastal Barrier Resources Act.

Supporting documentation

[APPENDIX B coastal barriers 4-30-18.docx](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Flood Insurance

General requirements	Legislation	Regulation
Certain types of federal financial assistance may not be used in floodplains unless the community participates in National Flood Insurance Program and flood insurance is both obtained and maintained.	Flood Disaster Protection Act of 1973 as amended (42 USC 4001-4128)	24 CFR 50.4(b)(1) and 24 CFR 58.6(a) and (b); 24 CFR 55.1(b).

1. Does this project involve financial assistance for construction, rehabilitation, or acquisition of a mobile home, building, or insurable personal property?

No. This project does not require flood insurance or is excepted from flood insurance.

✓ Yes

2. Upload a FEMA/FIRM map showing the site here:

[Sunnyside flood map 2-12-19.pdf](#)
[2620 N Balboa flood map 2-12-19.pdf](#)
[2490 N Oracle flood map 2-12-19.pdf](#)
[250 W Grant flood map 2-12-19.pdf](#)

The Federal Emergency Management Agency (FEMA) designates floodplains. The [FEMA Map Service Center](#) provides this information in the form of FEMA Flood Insurance Rate Maps (FIRMs). For projects in areas not mapped by FEMA, use the best available information to determine floodplain information. Include documentation, including a discussion of why this is the best available information for the site. Provide FEMA/FIRM floodplain zone designation, panel number, and date within your documentation.

Is the structure, part of the structure, or insurable property located in a FEMA-designated Special Flood Hazard Area?

✓ No

Based on the response, the review is in compliance with this section.

Yes

Screen Summary

Compliance Determination

The project sites are not in FEMA-designated Special Flood Hazard Areas. 250 W. Grant

Road, Tucson Pima County AZ 85705 - Zone X 4019C-2277 L dated 6/16/2011. 2620 N. Balboa Avenue, Tucson Pima County AZ, 85705 - Zone X 4019C-1688 L dated 6/16/2011. 2940 N. Oracle Road, Tucson Pima County AZ, 85705 - Zone X 4019C-2276 L dated 6/16/2011. Sunnyside Pointe, Tucson Pima County AZ 8506 - Zone X 4019C-2287 L dated 6/16/2011. The City of Tucson, #040076 is a participating member of the NFIP as of 8/5/19 per the FEMA Community Status Book Report. The project is in compliance with flood insurance requirements.

Supporting documentation

[FEMA Community Book 8-5-19.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Air Quality

General requirements	Legislation	Regulation
The Clean Air Act is administered by the U.S. Environmental Protection Agency (EPA), which sets national standards on ambient pollutants. In addition, the Clean Air Act is administered by States, which must develop State Implementation Plans (SIPs) to regulate their state air quality. Projects funded by HUD must demonstrate that they conform to the appropriate SIP.	Clean Air Act (42 USC 7401 et seq.) as amended particularly Section 176(c) and (d) (42 USC 7506(c) and (d))	40 CFR Parts 6, 51 and 93

1. Does your project include new construction or conversion of land use facilitating the development of public, commercial, or industrial facilities OR five or more dwelling units?

Yes

No

Air Quality Attainment Status of Project's County or Air Quality Management District

2. Is your project's air quality management district or county in non-attainment or maintenance status for any criteria pollutants?

No, project's county or air quality management district is in attainment status for all criteria pollutants.

Yes, project's management district or county is in non-attainment or maintenance status for the following criteria pollutants (check all that apply):

Carbon Monoxide

Lead

Nitrogen dioxide

Sulfur dioxide

Ozone

Particulate Matter, <2.5 microns

Particulate Matter, <10 microns

3. What are the *de minimis* emissions levels (40 CFR 93.153) or screening levels for the non-attainment or maintenance level pollutants indicated above

Carbon monoxide 35.00 ppm (parts per million)

Provide your source used to determine levels here:

Richard Grimaldi, Deputy Director of Pima County Department of Environmental Quality. Memo of file.

4. Determine the estimated emissions levels of your project. Will your project exceed any of the *de minimis* or threshold emissions levels of non-attainment and maintenance level pollutants or exceed the screening levels established by the state or air quality management district?

- ✓ No, the project will not exceed *de minimis* or threshold emissions levels or screening levels.

Enter the estimate emission levels:

Carbon monoxide 9.00 ppm (parts per million)

Based on the response, the review is in compliance with this section.

Yes, the project exceeds *de minimis* emissions levels or screening levels.

Screen Summary

Compliance Determination

The project's county or air quality management district is in non-attainment status for Carbon monoxide. This project does not exceed *de minimis* emissions levels or the screening level established by the state or air quality management district for the pollutant. ADEQ and Pima County Department of Environmental Quality sites have been reviewed and these agencies have no concerns about multi-family or small apartment complexes (under 100 units) development in existing residential areas changing or

adversely impacting air quality control standards. This project has no more than 63 units on any single site. ADEQ has no active impact sites in Tucson. The project is in compliance with the Clean Air Act.

Supporting documentation

[APPENDIX D Air quality 4-30-18.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Coastal Zone Management Act

General requirements	Legislation	Regulation
Federal assistance to applicant agencies for activities affecting any coastal use or resource is granted only when such activities are consistent with federally approved State Coastal Zone Management Act Plans.	Coastal Zone Management Act (16 USC 1451-1464), particularly section 307(c) and (d) (16 USC 1456(c) and (d))	15 CFR Part 930

This project is located in a state that does not participate in the Coastal Zone Management Program. Therefore, this project is in compliance with the Coastal Zone Management Act.

Screen Summary

Compliance Determination

This project is located in a state that does not participate in the Coastal Zone Management Program. Therefore, this project is in compliance with the Coastal Zone Management Act.

Supporting documentation

[APPENDIX B coastal zones 4-30-18.docx](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Contamination and Toxic Substances

General requirements	Legislation	Regulations
It is HUD policy that all properties that are being proposed for use in HUD programs be free of hazardous materials, contamination, toxic chemicals and gases, and radioactive substances, where a hazard could affect the health and safety of the occupants or conflict with the intended utilization of the property.		24 CFR 58.5(i)(2) 24 CFR 50.3(i)

1. How was site contamination evaluated? Select all that apply. Document and upload documentation and reports and evaluation explanation of site contamination below.

- American Society for Testing and Materials (ASTM) Phase I Environmental Site Assessment (ESA)
- ASTM Phase II ESA
- Remediation or clean-up plan
- ASTM Vapor Encroachment Screening
- None of the Above

2. Were any on-site or nearby toxic, hazardous, or radioactive substances found that could affect the health and safety of project occupants or conflict with the intended use of the property? (Were any recognized environmental conditions or RECs identified in a Phase I ESA and confirmed in a Phase II ESA?)

- No

Explain:

The Phase II laboratory results indicated no VOCs or PAHs were detected above the laboratory reporting limits. The laboratory reported concentrations of the eight RCRA metals were considered normal background concentrations. Western Technologies recommends no further assessment required.

Based on the response, the review is in compliance with this section.

Yes

Screen Summary

Compliance Determination

Site contamination was evaluated as follows: ASTM Phase I ESA, ASTM Phase II ESA. On-site or nearby toxic, hazardous, or radioactive substances that could affect the health and safety of project occupants or conflict with the intended use of the property were not found. The Phase I ESAs on 3 of the properties by Western Technologies Inc. dated August 2019 revealed no evidence of RECs currently in connection with the Property. On the Grant Road site it was determined that the Property historically had an underground storage tank (UST) system and this historic UST system creates a Potential Recognized Environmental Condition. The Phase II ESA laboratory results indicated no VOCs or PAHs were detected above the laboratory reporting limits. The laboratory reported concentrations of the eight RCRA metals were considered normal background concentrations. Lead and asbestos testing and remediation are required as part of the demolition permit for the Balboa site. Lead and asbestos tests are required, along with a remediation plan before the issuance of the demolition permit and work will be performed using environmentally safe practices. The project is in compliance with contamination and toxic substances requirements.

Supporting documentation

[Phase I Balboa 9-3-19.pdf](#)

[Phase I Sunnyside 9-3-19.pdf](#)

[Phase I Oracle Road 9-3-19.pdf](#)

[250 E Grant La Frontera Phase II ESA.pdf](#)

[Phase I ESA 250 East Grant Road La Frontera.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Endangered Species

General requirements	ESA Legislation	Regulations
Section 7 of the Endangered Species Act (ESA) mandates that federal agencies ensure that actions that they authorize, fund, or carry out shall not jeopardize the continued existence of federally listed plants and animals or result in the adverse modification or destruction of designated critical habitat. Where their actions may affect resources protected by the ESA, agencies must consult with the Fish and Wildlife Service and/or the National Marine Fisheries Service (“FWS” and “NMFS” or “the Services”).	The Endangered Species Act of 1973 (16 U.S.C. 1531 <i>et seq.</i>); particularly section 7 (16 USC 1536).	50 CFR Part 402

1. Does the project involve any activities that have the potential to affect species or habitats?

No, the project will have No Effect due to the nature of the activities involved in the project.

- ✓ No, the project will have No Effect based on a letter of understanding, memorandum of agreement, programmatic agreement, or checklist provided by local HUD office

Explain your determination:

The sites are fully or previously developed urban infill parcels in urban neighborhoods. Three site are completely graded and ready for construction. The Balboa site has 3 abandoned structures that will be demolished and heavy weed growth, but little permanent vegetation. The sites do not have water features and no visible sign of animal habitation. The U.S. Fish and Wildlife Services show no critical habitat areas in the Tucson Metropolitan area.

Based on the response, the review is in compliance with this section. Document and upload all documents used to make your determination below.

Yes, the activities involved in the project have the potential to affect species and/or habitats.

Screen Summary

Compliance Determination

The project will have no effect on any federally protected (listed or proposed) Threatened or Endangered Species, nor adversely modify designated critical habitats. The sites are fully or previously developed urban infill parcels in urban neighborhoods. The sites do not have water features or vegetation, and no visible sign of animal habitation. The U.S. Fish and Wildlife Services show no critical habitat areas in the Tucson Metropolitan area. The project is compliance with the Endangered Species Act. This project is in compliance with the Endangered Species Act.

Supporting documentation

[Sunnyside Aerial 2-12-19.pdf](#)
[2940 N Oracle Aerial 2-12-19.pdf](#)
[2620 N Balboa Ave aerial 2-12-19.pdf](#)
[250 W Grant aerial 2-12-19.pdf](#)
[IPaC list 5-14-18.pdf](#)
[Critical Habitat Map 5-2-18.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Explosive and Flammable Hazards

General requirements	Legislation	Regulation
HUD-assisted projects must meet Acceptable Separation Distance (ASD) requirements to protect them from explosive and flammable hazards.	N/A	24 CFR Part 51 Subpart C

1. Is the proposed HUD-assisted project a hazardous facility (a facility that mainly stores, handles or processes flammable or combustible chemicals), i.e. bulk fuel storage facilities, refineries, etc.?

No

Yes

2. Does this project include any of the following activities: development, construction, rehabilitation that will increase residential densities, or conversion?

No

Yes

3. Within 1 mile of the project site, are there any current *or planned* stationary aboveground storage containers:

- Of more than 100 gallon capacity, containing common liquid industrial fuels OR
- Of any capacity, containing hazardous liquids or gases that are not common liquid industrial fuels?

No

Based on the response, the review is in compliance with this section. Document and upload all documents used to make your determination below.

Yes

Screen Summary

Compliance Determination

After review of the Phase I Environmental Site Assessments by Western Technologies, Inc., dated August 2019 and site visits by City of Tucson Housing and Community Development staff 2/7/19, and review of known environmental registrations and maps, the determination is that the project sites are not in the vicinity of any hazardous operation involving explosive or flammable fuels or chemicals. There are no current or planned stationary above ground storage containers of concern within 1 mile of the project sites. The project sites are in fully developed urban residential/mixed use neighborhoods. The project is in compliance with explosive and flammable hazard requirements.

Supporting documentation

[Sunnyside Aerial 2-12-19\(1\).pdf](#)

[2940 N Oracle Aerial 2-12-19\(1\).pdf](#)

[2620 N Balboa Ave aerial 2-12-19\(1\).pdf](#)

[250 W Grant aerial 2-12-19\(1\).pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Farmlands Protection

General requirements	Legislation	Regulation
The Farmland Protection Policy Act (FPPA) discourages federal activities that would convert farmland to nonagricultural purposes.	Farmland Protection Policy Act of 1981 (7 U.S.C. 4201 et seq.)	7 CFR Part 658

1. Does your project include any activities, including new construction, acquisition of undeveloped land or conversion, that could convert agricultural land to a non-agricultural use?

Yes

No

If your project includes new construction, acquisition of undeveloped land or conversion, explain how you determined that agricultural land would not be converted:

The sites do not meet the definition of farmland per 7 CFR Part 658. The sites are in a fully developed urban environment per USDA Soils Survey Map printed 7/20/17. The project is in compliance with the Farmland Protection Policy Act.

Based on the response, the review is in compliance with this section. Document and upload all documents used to make your determination below.

Screen Summary

Compliance Determination

The sites do not meet the definition of farmland per 7 CFR Part 658.2 a (1) "Farmland" does not include land already in or committed to urban development or water storage. The sites are in a fully developed urban environment per USDA Soils Survey Map printed 5/11/18. This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The project is in compliance with the Farmland Protection Policy Act.

Supporting documentation

[USDA Urban Area Soils Map 5-11-18.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Floodplain Management

General Requirements	Legislation	Regulation
Executive Order 11988, Floodplain Management, requires federal activities to avoid impacts to floodplains and to avoid direct and indirect support of floodplain development to the extent practicable.	Executive Order 11988	24 CFR 55

1. Do any of the following exemptions apply? Select the applicable citation? [only one selection possible]

55.12(c)(3)

55.12(c)(4)

55.12(c)(5)

55.12(c)(6)

55.12(c)(7)

55.12(c)(8)

55.12(c)(9)

55.12(c)(10)

55.12(c)(11)

None of the above

2. Upload a FEMA/FIRM map showing the site here:

[Sunnyside flood map 2-12-19.pdf](#)

[2620 N Balboa flood map 2-12-19.pdf](#)

[2490 N Oracle flood map 2-12-19.pdf](#)

[250 W Grant flood map 2-12-19.pdf](#)

The Federal Emergency Management Agency (FEMA) designates floodplains. The FEMA Map Service Center provides this information in the form of FEMA Flood Insurance Rate Maps (FIRMs). For projects in areas not mapped by FEMA, use **the best available information** to determine floodplain information. Include documentation, including a discussion of why this is the best available information for the site.

Does your project occur in a floodplain?

No

Based on the response, the review is in compliance with this section.

Yes

Screen Summary

Compliance Determination

The project sites are not in FEMA-designated Special Flood Hazard Areas. 250 W. Grant Road, Tucson Pima County AZ 85705 - Zone X 4019C-2277 L dated 6/16/2011. 2620 N. Balboa Avenue, Tucson Pima County AZ, 85705 - Zone X 4019C-1688 L dated 6/16/2011. 2940 N. Oracle Road, Tucson Pima County AZ, 85705 - Zone X 4019C-2276 L dated 6/16/2011. Sunnyside Pointe, Tucson Pima County AZ 8506 - Zone X 4019C-2287 L dated 6/16/2011. The project is in compliance with Executive Order 11988.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

✓ No

Historic Preservation

General requirements	Legislation	Regulation
Regulations under Section 106 of the National Historic Preservation Act (NHPA) require a consultative process to identify historic properties, assess project impacts on them, and avoid, minimize, or mitigate adverse effects	Section 106 of the National Historic Preservation Act (16 U.S.C. 470f)	36 CFR 800 "Protection of Historic Properties" http://www.access.gpo.gov/nara/cfr/waisidx_10/36cfr800_10.html

Threshold

Is Section 106 review required for your project?

No, because the project consists solely of activities listed as exempt in a Programmatic Agreement (PA). (See the PA Database to find applicable PAs.)

- ✓ No, because the project consists solely of activities included in a No Potential to Cause Effects memo or other determination [36 CFR 800.3(a)(1)].

Yes, because the project includes activities with potential to cause effects (direct or indirect).

Threshold (b). Document and upload the memo or explanation/justification of the other determination below:

Based on the response, the review is in compliance with this section.

Screen Summary

Compliance Determination

Based on the project description the project has No Potential to Cause Effects. The Area of Potential Effects (APE) for the Alborada Apartments project is defined as the individual area of construction on of each of the 4 sites. No effects are anticipated outside the immediate area of construction on each site. A memo with the

determination that there are no historic properties affected per 36 CFR 800.4 from City of Tucson Historic Preservation Officer is dated 1/31/19, and in accordance with the programmatic agreement with the City of Tucson, SHPO and ACHP dated 1/25/2002. The project is in compliance with Section 106.

Supporting documentation

[Alborado Point HPO Letter Jan 31 2019.pdf](#)

[Miracle Pointe Apts_SHPO concurrence.pdf](#)

[HPO Programmatic agreement.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Noise Abatement and Control

General requirements	Legislation	Regulation
HUD's noise regulations protect residential properties from excessive noise exposure. HUD encourages mitigation as appropriate.	Noise Control Act of 1972 General Services Administration Federal Management Circular 75-2: "Compatible Land Uses at Federal Airfields"	Title 24 CFR 51 Subpart B

1. What activities does your project involve? Check all that apply:

- New construction for residential use

NOTE: HUD assistance to new construction projects is generally prohibited if they are located in an Unacceptable zone, and HUD discourages assistance for new construction projects in Normally Unacceptable zones. See 24 CFR 51.101(a)(3) for further details.

Rehabilitation of an existing residential property

A research demonstration project which does not result in new construction or reconstruction

An interstate land sales registration

Any timely emergency assistance under disaster assistance provision or appropriations which are provided to save lives, protect property, protect public health and safety, remove debris and wreckage, or assistance that has the effect of restoring facilities substantially as they existed prior to the disaster

None of the above

4. Complete the Preliminary Screening to identify potential noise generators in the vicinity (1000' from a major road, 3000' from a railroad, or 15 miles from an airport).

Indicate the findings of the Preliminary Screening below:

There are no noise generators found within the threshold distances above.

- ✓ Noise generators were found within the threshold distances.

5. **Complete the Preliminary Screening to identify potential noise generators in the**

Acceptable: (65 decibels or less; the ceiling may be shifted to 70 decibels in circumstances described in §24 CFR 51.105(a))

- ✓ Normally Unacceptable: (Above 65 decibels but not exceeding 75 decibels; the floor may be shifted to 70 decibels in circumstances described in §24 CFR 51.105(a))

Is your project in a largely undeveloped area?

- ✓ No

Indicate noise level here: 66.5

Document and upload noise analysis, including noise level and data used to complete the analysis below.

Yes

Unacceptable: (Above 75 decibels)

HUD strongly encourages conversion of noise-exposed sites to land uses compatible with high noise levels.

Check here to affirm that you have considered converting this property to a non-residential use compatible with high noise levels.

Indicate noise level here: 66.5

Document and upload noise analysis, including noise level and data used to complete the analysis below.

6. **HUD strongly encourages mitigation be used to eliminate adverse noise impacts. Explain in detail the exact measures that must be implemented to mitigate for the impact or**

effect, including the timeline for implementation. This information will be automatically included in the Mitigation summary for the environmental review.

✓ Mitigation as follows will be implemented:

Noise wall at 250 E. Grant Road running east to west along Grant Road. 1. 2X6 exterior walls with R-21 Batt insulations in cavities and 1 1/2

Based on the response, the review is in compliance with this section. Document and upload drawings, specifications, and other materials as needed to describe the project's noise mitigation measures below.

No mitigation is necessary.

Screen Summary

Compliance Determination

A Noise Assessment was conducted for all four sites. The noise level at 3 of the 4 sites was in the acceptable range, with standard construction practices bringing the interior noise level to or below the 45 dB minimum requirement. One site, 250 E. Grant Road was at 66.5 DNL, in the normally unacceptable range. With the sound attenuation measures listed in the mitigation section and confirmed by the project architect, the interior noise level will meet or exceed the 45 dB interior noise requirements. The project is in compliance with HUD's Noise regulation with mitigation.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

✓ No

Sole Source Aquifers

General requirements	Legislation	Regulation
The Safe Drinking Water Act of 1974 protects drinking water systems which are the sole or principal drinking water source for an area and which, if contaminated, would create a significant hazard to public health.	Safe Drinking Water Act of 1974 (42 U.S.C. 201, 300f et seq., and 21 U.S.C. 349)	40 CFR Part 149

1. Does the project consist solely of acquisition, leasing, or rehabilitation of an existing building(s)?

Yes

No

2. Is the project located on a sole source aquifer (SSA)?

A sole source aquifer is defined as an aquifer that supplies at least 50 percent of the drinking water consumed in the area overlying the aquifer. This includes streamflow source areas, which are upstream areas of losing streams that flow into the recharge area.

No

Yes

3. Does your region have a memorandum of understanding (MOU) or other working agreement with Environmental Protection Agency (EPA) for HUD projects impacting a sole source aquifer?

Yes

Document and upload MOU or Agreement below.

No

4. For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Explain in detail the exact measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation. This information will be automatically included in the Mitigation summary for the environmental review. If negative effects cannot be mitigated, cancel the project using the button at the bottom of this screen

Yes

Document and upload where your project fits within the MOU or working agreement below. Based on the response, the review is in compliance with this section.

No

Screen Summary

Compliance Determination

The project is located on a sole source aquifer. The region has an MOU or other working agreement with EPA for HUD projects impacting a sole source aquifer, and the MOU or working agreement excludes the project from further review. The project will utilize existing municipal water and sewer systems. The project is in compliance with Sole Source Aquifer requirements.

Supporting documentation

[APPENDIX M sole source aquifer 5-2-18.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Wetlands Protection

General requirements	Legislation	Regulation
Executive Order 11990 discourages direct or indirect support of new construction impacting wetlands wherever there is a practicable alternative. The Fish and Wildlife Service's National Wetlands Inventory can be used as a primary screening tool, but observed or known wetlands not indicated on NWI maps must also be processed. Off-site impacts that result in draining, impounding, or destroying wetlands must also be processed.	Executive Order 11990	24 CFR 55.20 can be used for general guidance regarding the 8 Step Process.

1. Does this project involve new construction as defined in Executive Order 11990, expansion of a building's footprint, or ground disturbance? The term "new construction" shall include draining, dredging, channelizing, filling, diking, impounding, and related activities and any structures or facilities begun or authorized after the effective date of the Order

No

✓ Yes

2. Will the new construction or other ground disturbance impact an on- or off-site wetland? The term "wetlands" means those areas that are inundated by surface or ground water with a frequency sufficient to support, and under normal circumstances does or would support, a prevalence of vegetative or aquatic life that requires saturated or seasonally saturated soil conditions for growth and reproduction. Wetlands generally include swamps, marshes, bogs, and similar areas such as sloughs, potholes, wet meadows, river overflows, mud flats, and natural ponds.

"Wetlands under E.O. 11990 include isolated and non-jurisdictional wetlands."

✓ No, a wetland will not be impacted in terms of E.O. 11990's definition of new construction.

Based on the response, the review is in compliance with this section. Document and upload a map or any other relevant documentation below which explains your determination

Yes, there is a wetland that be impacted in terms of E.O. 11990's definition of new construction.

Screen Summary

Compliance Determination

The project does not involve new construction within or adjacent to wet lands, marshes, wet meadows, mud flats or natural ponds. The wetland area near Sunnyside Pointe is limited to a drainage channel not impacted by the project. The project is in compliance with Executive order 11990.

Supporting documentation

[Sunnyside Pointe wetlands 2-12-19.pdf](#)

[Oracle Balboa Grant site Wetlands map 2-12-19.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Wild and Scenic Rivers Act

General requirements	Legislation	Regulation
The Wild and Scenic Rivers Act provides federal protection for certain free-flowing, wild, scenic and recreational rivers designated as components or potential components of the National Wild and Scenic Rivers System (NWSRS) from the effects of construction or development.	The Wild and Scenic Rivers Act (16 U.S.C. 1271-1287), particularly section 7(b) and (c) (16 U.S.C. 1278(b) and (c))	36 CFR Part 297

1. Is your project within proximity of a NWSRS river?

No

Yes, the project is in proximity of a Designated Wild and Scenic River or Study Wild and Scenic River.

Yes, the project is in proximity of a Nationwide Rivers Inventory (NRI) River.

Screen Summary

Compliance Determination

This project is not within proximity of a NWSRS river. Tucson and Southern Arizona have no wild and scenic rivers. The project is in compliance with the Wild and Scenic Rivers Act.

Supporting documentation

[APPENDIX O wild rivers 5-2-18.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Environmental Justice

General requirements	Legislation	Regulation
Determine if the project creates adverse environmental impacts upon a low-income or minority community. If it does, engage the community in meaningful participation about mitigating the impacts or move the project.	Executive Order 12898	

HUD strongly encourages starting the Environmental Justice analysis only after all other laws and authorities, including Environmental Assessment factors if necessary, have been completed.

1. Were any adverse environmental impacts identified in any other compliance review portion of this project’s total environmental review?

Yes

✓ No

Based on the response, the review is in compliance with this section.

Screen Summary

Compliance Determination

The proposed sites are suitable for the proposed use and will NOT be adversely impacted by adverse environmental conditions. This environmental review demonstrates that there are no issues of non-compliance with the related laws and authorities and there are no known unresolved impacts. The project is in compliance with Executive Order 12898.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

✓ No